

LAW OFFICES

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September 10, 2015

GARY GREEN
gg@greatlawyers.com

The Honorable Thomas N. O'Neill
4007 U. S. Courthouse
601 Market Street
Philadelphia, PA 19106-1797

Re: Parker v. Holland, Civil Action No. 15-3304

Dear Judge O'Neill:

This is a response to the letter sent by the *pro se* Plaintiff in the above-captioned matter (a copy of which is attached) in which he gave Your Honor two emails from me that he mischaracterizes as “threatening”, and asks for another delay in the Court’s determination of Defendant’s Rule 11 Motion for Sanctions and Plaintiff’s motion to disqualify me as Defendant’s counsel. In his letter, Plaintiff promises to file additional pleadings based on a gross misinterpretation of what I said in the emails, and tries to postpone the day of reckoning on the pending motions to some distant time in the future.

It is understandable that judges give *pro se* plaintiffs leeway, but Plaintiff, who holds himself out as a skilled paralegal, and who has 20 years of experience as a serial litigator filing *pro se* Complaints in several different federal courts, as well as in the Court of Common Pleas, probably deserves less leeway; and I do not believe the Court would allow a licensed attorney to get away with the pattern of behavior and dilatory tactics Plaintiff has perpetrated here in an effort to forestall a ruling.

Pending before the court are (1) Defendant’s Motion to Dismiss the Complaint based on lack of personal jurisdiction and demurrer on all counts; (2) Defendant’s Rule 11 Motion based on Plaintiff’s cyberstalking and use of the Complaint as a vehicle to enhance his status on the Internet for what he imagines is a large audience of people who follow him, and are influenced by his opinions; and (3) Plaintiff’s Motion to disqualify me, apparently based on his belief that if he thinks my litigation strategy is aggressive and offensive to him, that it somehow creates a conflict of interest between my client and me.

As pointed out in the Rule 11 Motion, although Plaintiff had no grounds for this lawsuit and there is no personal jurisdiction, he filed his *pro se* case for the main purpose of being able to refer his “followers” to a website where he posted all of the pleadings to create the false impression that there is a legitimate link between Plaintiff and Defendant, a movie and television actress who has recently become a hypnotherapist after pursuing formal training and education in that field.

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Plaintiff has already protracted the proceedings in numerous ways, none of which have changed the picture. Indeed, even though the case is essentially at the motion to dismiss level, Plaintiff sees the case as a *Jarndyce and Jarndyce* type of litigation as depicted in Dickens' *Bleak House*. Plaintiff, for example, served a voluminous Complaint on Defendant, but filed with the Court only a smaller portion of what he served. Then, while Defendant was in the middle of preparing the Motion to dismiss the original Complaint, Plaintiff filed an Amended Complaint. Plaintiff has also filed amendments to his responses and rejoinders in connection with the motions, and cut out most of the summer based on a claim that he was ill. The end result is that rather than the orderly, well regulated manner of defining and narrowing the issues established by the Federal Rule of Civil Procedure and practice, the filings by Plaintiff have taken on the character of an unruly and undisciplined Internet type bulletin board, where a party like Plaintiff always must get the last word, and what is said is mostly irrelevant and often venomous.

Addressing the specific request in Plaintiff's letter (which is undated but which was delivered to me today), the two emails that he attaches as Exhibits "A" and "B" do not justify any delay in the Court's ruling on the three pending motions. Exhibit "A" was my response to Plaintiff's numerous threats during the past weeks to injure the reputation of Defendant on the Internet, which had to be viewed along with Plaintiff's incessant cyberstalking.

Plaintiff's cyberstalking and harassment of Defendant reached the point that Defendant had to beseech the website, Wikipedia, to bar Plaintiff from editing the Wikipedia page that discussed Defendant's roles in movies and television. Defendant was also obliged to take steps to stop Plaintiff from defacing her Face Book page with malicious comments. In addition, as part of Defendant's profession, she posts YouTube videos, but within minutes of any YouTube video, Plaintiff added harmful comments. He also has continued to write malicious and negative things about Defendant on consumer sites, such as ripoffreport.com and yelp.com. Since Plaintiff was never a customer of Defendant, his reviews are misleading, and designed just to harass and injure Defendant.

In an effort to attempt to curtail Plaintiff's cyberstalking and annoyance of Defendant, I pointed out to Plaintiff (in the email attached as Exhibit "A") that the Internet offers much evidence showing Plaintiff has been harassing women since 1997, and that he had been blocked from websites, including a website maintained by a community of strippers, where they talked about their working conditions and customer related issues. That website documented Plaintiff's history of harassing the strippers, and in a 2008 posting, a "registered professional hypno psychotherapist" commented on Plaintiff's behavior, and gave advice to victims of Plaintiff's harassment about how to deal with him. My email simply copied text from the web. No threat was made in my email, and in fact, I mentioned that I thought the instant case would be dismissed, and therefore, no witnesses would ever be called to testify. However, I was alerting Plaintiff that if he persisted in his cyberstalking and bullying of women, he might in fact find himself in a courtroom setting where live witnesses would testify in another case.

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On Page ii of Exhibit "A", there is a copy of Plaintiff's email to me in which he threatened my law firm and me with a Title VII action, based on the wild notion that somehow we were involved in a conspiracy with other lawyers in Philadelphia to not hire Plaintiff (even though Plaintiff has never applied for a position at my firm, and the people who handle the HR and hiring here never heard of Plaintiff).

In Exhibit "B" to Plaintiff's letter, I responded to his threats against my law firm and me, and again noted that I believed the instant case will be dismissed, and there would be no live testimony here, but because Plaintiff threatened to file negative comments about my law firm and me on the same consumer sites he used to denigrate Defendant (ripoffreport.com and yelp.com), and to file charges against my law firm and me with the EEOC and other agencies, that he might find himself litigating with me, not just as counsel for Defendant, but as a party.

In neither of the emails did anything I wrote constitute a threat on the one hand, and on the other, the emails have nothing whatsoever to do with the three motions before the Court.

Accordingly, based on what Plaintiff described he intends to include in his prophesized new filings, there is no reason to delay the Court's ruling on the three outstanding motions. There is likewise no need to have any conference or argument because the Court has already been inundated with all the information that the Court could ever possibly need or want to reach decisions on the three motions.

On a personal note, I hope that the court can resolve the motions sooner rather than later because while Plaintiff is *pro se* and unemployed and has plenty of time to keep hammering out pleadings, amendments, motions, etc., Defendant is obliged to pay legal fees to answer Defendant's deluge, and is trying to not be distracted by the antics of Plaintiff on the web and in this case.

Respectfully,



Gary Green

GG/ng
Enclosure

cc: Gordon Roy Parker (w/o enclosure)

4247 Locust Street, #119
Philadelphia, PA 19104
(267) 298-1257

The Hon. Thomas N. O'Neill
4007 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106-1797

Re: Parker v. Goldhagen (15-cv-3304)

Your Honor:

I have attached two highly threatening e-mails sent to me from defense counsel Gary Green, Esq. While I am still working out the full legal implications of his threats, I add them in this letter to you as a supplement to both my responses to the Rule 11 motion for Sanctions, and to my Motion To Disqualify Defense Counsel. I have two other concerns which have been raised by these letters, and will be moving this court in the next week regarding them, regardless of any orders which may come down in the interim, which is why I request that this Court await those pleadings prior to ruling, or expect that they will be raised on reconsideration (if necessary).

E-mail #1, the full text of which is attached to this letter as Exhibit A and incorporated by reference as if fully stated verbatim herein, states, in pertinent part:

Subject: #88 Parker - RE: #86 RE: #85 Parker - RE: #84 Parker –
RE: #83 Parker - RE: Parker #81 RE:...
Date: 9/10/2015 1:24:49 A.M. Eastern Daylight Time
From: gg@GreatLawyers.com
To: BettorOffSingle@aol.com

Contacted-by-Gordon-Roy-Parker, [from StripperWeb], a website that banned you in 2008, and reveals 20 years of your stalking and most pertinently, harrassing women, and misusing suits and threats of litigation to accomplish improper purposes. *I am sure the judges of the Eastern District will be enlightened on learning what other people have to say and testify about you when the judges consider your malicious motives for suing in your pro se cases. There apparently is a communoty of your women victims who want your mental health status to be officially established and put on the record; and who want to testify and tell a court what your MO is, and how you harmed them by stalking and being a nuisance.* While the Parker v. Holland action may be dismissed before that could happen here, you are compulsive, and will be likely to present new opportunitiies for your victims to get a chance to testify. *By my count there are dozens of likely witnesses who have relevant, sworn evidence to put on the record about you.* [emphasis added].

The above e-mail is clearly a Rule 26(f) disclosure of potential witnesses in the case, and constitutes yet another attempt to litigate the merits, for yet another ground upon which this Court should consider any of Defendant's jurisdictional objections waived.

E-mail #2 (full text is Exhibit B) states, in pertinent part:

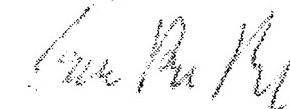
Date: 9/10/2015 3:02:08 A.M. Eastern Daylight Time
From: gg@GreatLawyers.com
To: BettorOffSingleBettorOffSingle@aol.com

The courts will figure out the truth from live witnesses, not hearsay or your mental illness inspired rantings. If the Holland case is dismissed, it will not happen in the pending case. But as I said, *you are compulsive and cannot control yourself*. You will file a Title VII charge or post something actionable about me somewhere (i.e., you already made a threat when you wrote: "I'll spare the rebuttal for a RIPOFF REPORT on your firm, or a YELP review from the perspective of an adversary who understands the insides of law offices better than your clients ever will"). Of course it is also likely you will stalk someone who will want to end your maliciousness by suing you.

Thus, while no vehicle exists yet for me to mount that case, your threats to sue me, or attack my reputation on Yelp and Ripoff Report tonight may lead to that vehicle.... You can disparage the people who posted things about you when you call the postings forgeries in briefs and emails; but when they show up in court, they will be creating a record of sworn evidence.

This is a clearly extortionist threat to intimidate me into not filing a Title VII action, and into dropping this action. Defendant is free to call any witness she likes – Plaintiff would welcome the ability to cross-examine those who lie about him so freely online – but there was no need to directly threaten Plaintiff in this manner, after declining to participate in any Rule 26(f) discussions.

Sincerely,



Gordon Roy Parker, Pro Se
4247 Locust Street, #119
Philadelphia, PA 19104
(267) 298-1257
SnodgrassPublish@aol.com
PLAINTIFF

/grp

Attachments (2): E-mails

cc: Gary Green, Esq.

Exhibit A – Email #1

[Text of e-mail from Defense Counsel]

The following was copied from <https://www.stripperweb.com/forum/showthread.php?106244->

Contacted-by-Gordon-Roy-Parker, [from StripperWeb], a website that banned you in 2008, and reveals 20 years of your stalking and most pertinently, harrassing women, and misusing suits and threats of litigation to accomplish improper purposes. *I am sure the judges of the Eastern District will be enlightened on learning what other people have to say and testify about you when the judges consider your malicious motives for suing in your pro se cases. There apparently is a communoty of your women victims who want your mental health status to be officially established and put on the record; and who want to testify and tell a court what your MO is, and how you harmed them by stalking and being a nuisance.* While the Parker v. Holland action may be dismissed before that could happen here, you are compulsive, and will be likely to present new opportunitiies for your victims to get a chance to testify. By my count there are dozens of likely witnesses who have relevant, sworn evidence to put on the record about you. Below is a snippet: [*emphasis on threatening language added*].

[Post quoted by poster on Stripperweb who is not an attorney]

By serving you papers, he gives you standing to file a countersuit against him. If Gordon were to get any of his "cases" into a real courtroom, he will most certainly be required to take the psychological evaluation he so fears... We will leave you with a post made by a UK doctor [not a real medical doctor]. The messages he quotes are from 1997. Ray has had over 10 years of experience doing this...

Quote:

As a reference, I am a registered professional hypno-psychotherapist practicing in the UK. Gordon Roy Parker posts and chats as a vile, vicious person, seeking to inflict pain and suffering on those who he contacts. He lurks in chat rooms inventing fallacies and accusations of anyone he latches on to.

This is his pathetic, sad life and if it affected no one else, it could be ignored, but this isn't the case. He has affected, is affecting and will go on affecting the lives of people who do not deserve his attentions, unless something is done...

His posting history shows a serious psychotic disorder. He claimed in the distant past that his problem was diagnosed as Bipolar, (aka manic depression), but over the many many months, my professional opinion and that of others on this group differs, possibly BPD. Obviously the details are not that important. If the effects of his behaviour were not no horrid, the man could be pitied. As far as item 3 (above) goes, Ray keeps losing accounts and then gets a new one after aol have removed the first one. Obviously AOL need to have their attention drawn to this. Almost finally, to illustrate, I have included a transcript of a conversation with him on an aol chat room. I looked at these carefully to see if I could publish them verbatim and at the same time hide the identities of the innocent

parties, but I have had to completely remove some segments as they are almost unreadable after censorship. Therefore I shall include a few soundbites...

----- [allegedly quoting Plaintiff without citation]:
Go to hell, cunt. I will say that you are correct when it comes to profiteering from stolen material, but that's not what would apply in this case. And why do I insult you? I don't like female hypnotists. You all do the work of the devil and poison people's minds for your own exploitative purposes. Such a shame there's no way to erase memories because that way I could undo what was done to me. I've been called the coldest man on earth by some women lately. Take a bow and tip your hat, for it was your profession, and your gender's half of it, that is the cause. Insult me all you want, it doesn't matter. I'm too ethical to break the law so that pretty much leaves you out of harm's way where I'm concerned, but really to be honest I don't like you a bit. Don't like anyone from this group. And they've made sure they let me know they don't like me. Well good, because this little group of people has spoken for the entire fucking planet. Any time someone approaches me for anything they can go to hell. That includes ANYONE. Maybe one day when you are kissing up to the corporate executives you worship so much you could hypnotize them into not being racist and not harassing sexually the women who work for them. By the way, I just cast a spell on you wishing for your entire family to die in a horrible accident which you witness. And anyone who reads into that needs a life; spells are legal. I just don't like this cunt.

[In response to this e-mail from Plaintiff]:

[quoting my e-mail to him which provoked the threat]

From: BettorOffSingle@aol.com [mailto:BettorOffSingle@aol.com]
Sent: Thursday, September 10, 2015 12:25 AM
To: Gary Green gg@GreatLawyers.com
Subject: Re: #86 RE: #85 Parker - RE: #84 Parker - RE: #83 Parker - RE: Parker #81:

You have one, but not to me.

There's also the issue of separate litigation against your firm, and your remarks about my employability versus what the SSA and Office Of Vocational Rehabilitation tell me. Pleading immunity goes only so far; it can easily be inferred that you've said similar things about me beyond the pleadings, plus abuse of process can form the basis of a Title VII claim (see Burlington Northern v. White, 126 S. Ct. 2405 (2006)) -- that case was decided four months after my UPenn case was dismissed, too late for my retaliation claim to survive. Non-employment related actions give rise to retaliation claims.

Now since you are engaging in "parallel conspiratorial conduct" with area lawfirms to use pleadings to lie about me (and to defraud the federal government into giving me SSDI benefits to cover up pedophilic hiring practices among area law firms), some of my correspondence to you is directed at you, though your client will be along for the ride as a "respondeat superior." Have you informed her of this too? For THAT case I will certainly have jurisdiction.

Either way, if you want me to "fly blind" that's a failure to mitigate any of your future noise about not being put on notice, so my mission here is served. *I'll be meeting with the OVR and EEOC over the next month, and you can be sure you and your firm's names will come up.* As this creates a conflict in the current case, I moved to have you disqualified after asking you to recuse yourself. You've put me back in touch with many from my privileged youth. I guess for that I should be thankful. Women like your client are parasites where I grew up. I'm sure her own neighborhood is quickly realizing that, if you already haven't.

Sincerely,
Gordon Roy Parker, Pro Se
<snip>

**Exhibit B
E-Mail #2**

Subject: #91 Parker- Final I response to all you have written since #89

RE: #88 Parker - RE: #86

Date: 9/10/2015 3:02:08 A.M. Eastern Daylight Time

From: gg@GreatLawyers.com

Reply To:

To: Send IM to: BettorOffSingleBettorOffSingle@aol.com

CC: ggreen@focusers.com, gg@GreatLawyers.com

BCC:

Sent on:

Sent from the Internet (Details)

The courts will figure out the truth from live witnesses, not hearsay or your mental illness inspired rantings. If the *Holland* case is dismissed, it will not happen in the pending case. But as I said, you are compulsive and cannot control yourself. You will file a Title VII charge or post something actionable about me somewhere (*i.e.*, you already made a threat when you wrote: "I'll spare the rebuttal for a RIPOFF REPORT on your firm, or a YELP review from the perspective of an adversary who understands the insides of law offices better than your clients ever will"). Of course it is also likely you will stalk someone who will want to end your maliciousness by suing you.

Thus, while no vehicle exists yet for me to mount that case, your threats to sue me, or attack my reputation on Yelp and Ripoff Report tonight may lead to that vehicle. Trial lawyers need clients, and cannot do anything until someone we represent is injured. But when the opportunity arises, it is our duty to proceed to obtain justice. Your threats may grow into the vehicle since you seem to want to make me your opponent in court as a litigant in a new case while I am representing my client in the *Holland* case. (You will not find any case where a lawyer who represents a client against a party, and also is in a separate lawsuit with that party was disqualified. That scenario happens often, and as long as the lawyer's client is happy, the courts cannot mix in.). I will ask my staff to watch for anything you may write about me. As for your Title VII threat, let me know after you get your Right to Sue letter. You are on Rule 11 notice that my law firm has no paralegals, and we have had no staff openings for which you would be qualified, ever. Moreover, you never applied for a job, and the people who do the hiring do not even know you exist. Also, we have not had any reason to discuss you with any other law firm, and never discuss hiring of staff with other firms. But, please feel free to file whatever you think will get you justice; and then, so will I.

You can disparage the people who posted things about you when you call the postings forgeries in briefs and emails; but when they show up in court, they will be creating a record of sworn evidence. Then, you will get what you claim you want. You can tell your full biography under oath, and will be cross examined fully under oath too. In addition, the case will be pled so that live witnesses will offer their own testimony at the trial concerning their experiences with you, as well as whether your mental illness should be factored into the case. You can explain your patterns and history of behavior from the witness stand, and use your skills to try persuade the

jury that the reams you have written were not malicious or harmful, and that you were acting in a way that the jury would find is normal, acceptable behavior. It will be a First Amendment festival with all of those witnesses and you speaking freely for the record. A jury of average people will adjudicate your behavior, and bring back a verdict. In addition, judges will get to write opinions about the case after evidence has been actually presented to the jury. It will be your professed dream come true.

This will be my final email outside of the *Holland* case. I bent my own rule and responded to your email rants because I had pity on you. I pictured you as a lonely, discredited, hated wretch with the misguided notion that court cases and email with real lawyers are an extension of Internet chess. I wanted you to think someone actually read your email. Call it an act of charity. But I have used up the idle time I allotted for you, and I do not intend to be responding to your email any more, except as indicated below.

I elect to not communicate with you via email except where I have a professional responsibility as a lawyer in a case filed in court.

[quoted e-mail from Plaintiff in Response to Exhibit A]

From: BettorOffSingle@aol.com [mailto:BettorOffSingle@aol.com]
Sent: Thursday, September 10, 2015 1:31 AM
To: Gary Green <gg@GreatLawyers.com>
Subject: Re: #88 Parker - RE: #86 RE: #85 Parker - RE: #84 Parker - RE: #83 Parker - R...

You quote internet hearsay and lies with no due diligence, while I quote a federal judge who had to clench his teeth to overturn a ruling disqualifying you for conduct just like this. Says it all.

Ever wonder WHY these supposedly great witnesses "testify" online, and on a STRIPPER site no less?

You're sunk, and probably just took your silent down with you. Sincerely, Gordon Roy Parker.

p.s. -- I'll spare the rebuttal for a RIPOFF REPORT on your firm, or a YELP review from the perspective of an adversary who understands the insides of law offices better than your clients ever will.

<truncated to eliminate redundant quoting of Exhibit A mail>